

EXHIBIT D



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October 29, 2024

Via Email and Expedited Mail

Gayle C. Sproul
Senior Vice President, Legal Affairs
CBS News
555 West 57th Street
New York, NY 10019
Gayle.Sproul@CBS.com

Re: Response to Your Reply Letter dated October 23, 2024 regarding *60 Minutes*
Interview of Vice President Harris (the "Interview")

Dear Ms. Sproul:

I write once again on behalf of my client, President Donald J. Trump.

I am in receipt of your reply letter dated October 23, 2024, in which you falsely stated, *inter alia*, that "there [is no] legal basis for your demand that we provide you with the unedited transcript of the [60 MINUTES] Interview, which we decline to do." You also wrongly asserted that our "contention [] 60 MINUTES acted nefariously is entirely unfounded." Instead, you incorrectly claim, "the Interview was edited for time with the aim of allowing the public to hear from the Vice President on as many subjects as possible in a 21-minute interview."

Your obvious stonewalling is unpersuasive for three reasons, among many others: (1) The false and deceptive manner in which CBS edited Vice President Harris's answer to Mr. Whitaker's question regarding Prime Minister Netanyahu materially changed the content and meaning of her answer, (2) Broadcasting Vice President Harris's full response to Mr. Whitaker's question would have added mere seconds to the Interview, and (3) CBS's refusal to release the unedited transcript—a simple act of transparency that could be performed at no cost—confirms that CBS knows it committed a wrong, and wants to hide it. Indeed, if CBS believes it doesn't have any exposure, why not release the unedited transcript? By refusing to release the transcript, you've already answered that question—CBS is liable for one of the worst, most deceptive acts in broadcast history.

Given your refusal to resolve this matter without litigation, this letter serves as President Trump's pre-suit notice under the Texas Deceptive Trade Practices-Consumer Protection Act (the

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“DTPA”), Tex. Bus. & Comm. Code § 17.41 *et seq.*, specifically § 17.505, that CBS’s actions with respect to the Interview have caused President Trump to sustain economic damages,¹ together with attorneys’ fees in an amount to be determined.

Pursuant to § 17.46(a), CBS has engaged in unlawful “[f]alse, misleading, or deceptive acts or practices in the conduct of [its] trade” in that, as laid out in § 17.46(b), CBS “caus[ed] confusion or misunderstanding as to the source, sponsorship, approval, or certification of [its] services” and “caus[ed] confusion or misunderstanding as to affiliation, connection, or association with, or certification, by another.” Indeed, among other harmful effects of your wrongdoing, CBS’s deceptive editing of the Interview has made it impossible for viewers of *60 Minutes*, including members of the American public as a whole, and residents of Texas, in particular, to discern whether CBS was acting in its capacity as a news organization or on behalf of Vice President Harris’s failing presidential campaign. Accordingly, CBS’s editorial misconduct is actionable under §17.50(a)(1), and President Trump is entitled to economic damages (§17.50(b)(1)), an order enjoining CBS’s ongoing misconduct (§17.50(b)(2)), and attorneys’ fees (§17.50(d)).

We therefore once again demand that you immediately provide and publicly release the full, unedited transcript of the Interview, and that you pay President Trump damages as set forth above. Additionally, I remind you that in contemplation of possible litigation, we demand that you preserve all communications and documents relating to the Interview, together with any edits of the Interview’s content, and that you refrain from destroying any relevant communications or documents. We appreciate your anticipated cooperation.

All rights reserved.

Sincerely,

A handwritten signature in black ink that reads "Edward Paltzik". The signature is written in a cursive, flowing style.

Edward Andrew Paltzik
Counsel to President Donald J. Trump

¹ CBS’s distortion of the *60 Minutes* Interview damaged President Trump’s fundraising and support values by several billions of dollars, particularly in Texas.